

1 Zoya Kovalenko (BAR NO. 338624)
13221 Oakland Hills Blvd., Apt. 206
2 Germantown, MD 20874
+1 678 559 4682
3 zoyavk@outlook.com

4 *Attorney for Plaintiff Zoya Kovalenko*

5 LYNNE C. HERMLE (BAR NO. 99779)
lchermle@orrick.com
6 JOSEPH C. LIBURT (BAR NO. 155507)
jliburt@orrick.com
7 ORRICK, HERRINGTON & SUTCLIFFE LLP
1000 Marsh Road
8 Menlo Park, CA 94025-1015
Telephone: +1 650 614 7400
9 Facsimile: +1 650 614 7401

10 MARK THOMPSON (Admitted *pro hac vice*)
mthompson@orrick.com
11 ORRICK, HERRINGTON & SUTCLIFFE LLP
51 W 52nd Street
12 New York, NY 10019
Telephone: +1 212 506 5000
13 Facsimile: +1 212 506 5151

14 *Attorneys for Defendants*

15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA

17 ZOYA KOVALENKO,

18 Plaintiff,

19 v.

20 KIRKLAND & ELLIS LLP, MICHAEL DE
21 VRIES, MICHAEL W. DE VRIES, P.C.,
ADAM ALPER, ADAM R. ALPER, P.C.,
22 AKSHAY DEORAS, AKSHAY S. DEORAS,
P.C., AND MARK FAHEY,

23 Defendants.
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Case No. 4:22-CV-05990-HSG (TSH)

**DECLARATION OF JOSEPH C.
LIBURT IN SUPPORT OF JOINT
STATEMENT IN SUPPORT OF
FILIPPATOS PLLC'S
ADMINISTRATIVE MOTION TO
PARTIALLY SEAL FILIPPATOS
PLLCC'S MOTION TO QUASH
SUBPOENA OF FILIPPATOS PLLC'S
BANK RECORDS AND FOR
PROTECTIVE ORDER AND
SANCTIONS**

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DECLARATION OF JOSEPH C. LIBURT
ISO JOINT STATEMENT IN SUPPORT OF
ADMINISTRATIVE MOTION TO
PARTIALLY SEAL [4:22-CV-05990-HSG
(TSH)]

1 I, Joseph C. Liburt, hereby declare:

2 1. I am a partner at the law firm of Orrick, Herrington & Sutcliffe, LLP. I represent
3 Defendants Kirkland & Ellis LLP, Michael De Vries, Michael W. De Vries, P.C., Adam Alper,
4 Adam R. Alper, P.C., Akshay Deoras, Akshay S. Deoras, P.C., and Mark Fahey (collectively,
5 “Defendants”) in this matter. I submit this declaration in support of the parties’ Joint Statement in
6 Support of Filippatos PLLC’s Administrative Motion to Partially Seal Filippatos PLLC’s Motion
7 to Quash Subpoena of Filippatos PLLC’s Bank Records and for Protective Order and Sanctions
8 (the “Motion to Seal”). I have personal knowledge of the matters contained in this declaration. If
9 called to testify to the matters set forth in this declaration, I would do so competently.

10 2. Good cause exists to seal the redactions identified in the Motion to Seal for the
11 reasons set forth therein. Based on my professional experience, disclosure of these discussions
12 would prejudice both Defendants’ and Plaintiff’s interests in this action.

13 3. Filippatos PLLC has tailored its request to redact only confidential information.

14 I declare under penalty of perjury under the laws of the United States of America that the
15 foregoing is true and correct. Executed on April 28, 2025.

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17 /s/ Joseph C. Liburt
Joseph C. Liburt

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DECLARATION OF JOSEPH C. LIBURT
ISO JOINT STATEMENT IN SUPPORT OF
ADMINISTRATIVE MOTION TO
PARTIALLY SEAL [4:22-CV-05990-HSG
(TSH)]